

MEMORANDUM TO:        DISTRIBUTION

FROM:                    SUSAN L. FREY  
                             DEPARTMENTAL RECORDS OFFICER, IM-11

SUBJECT:                RM 2003-02: RECORDS STORAGE REQUIREMENTS

This memorandum serves to remind Headquarters and Field sites of key requirements governing the storage of Federal records. (The requirements are set forth in 36 CFR Parts 1220, 1222, and 1228.) Regardless of where our records are stored, the Department has a responsibility to ensure that the storage location(s) meet regulatory requirements.

Neither National Archives and Records Administration (NARA) nor Office of the Chief Information Officer (OCIO) approval is required to contract for storage with commercial facilities. However, the basic facility standards set forth in 36 CFR 1228 subpart K apply to NARA, DOE, *and* commercial records storage facilities. (Certain provisions apply only to new storage locations.)

When selecting a storage facility for Federal records, please keep the following requirements in mind.

- (1) Storage for permanent, unscheduled, and vital records must meet all of the regulations governing records storage facilities.
- (2) Special environmental controls are needed to appropriately store non-paper based records (e.g., film, audio tape, magnetic tape), especially those with long-term or permanent retention periods.
- (3) Civilian personnel records may only be transferred to the National Personnel Records Center in St. Louis.
- (4) If you contract with a commercial storage facility you must certify to NARA's Space and Security Management Division, at least 45 days prior to the first transfer of records, that the facility meets the regulatory requirements. This must be done prior to transferring any records to the facility (36 CFR 1228.240(e)). (The General Services Administration does *not* provide certification of compliance to NARA for commercial storage facilities on its Federal Supply Schedule.)
- (5) If records are stored in a commercial facility, you must ensure that the contract allows NARA access to the records for purposes of conducting an evaluation or processing a schedule for

disposition of the records (36 CFR 1228.154(e)).

(6) The same degree of intellectual control must be maintained over Federal records stored in commercial facilities as those records stored in NARA records centers. You must report to NARA prior to retiring permanent or potentially permanent records to a commercial facility for storage (36 CFR 1228.156(c)).

(7) Procedures for the disposal of temporary Federal records stored at commercial facilities must include a requirement that the facility notify the Records Manager at the Headquarters or Field site prior to disposal of any record, unless the disposal is initiated by the Records Manager (36 CFR 1228.156(c)).

(8) You must also ensure that records which are classified or otherwise restricted from disclosure by statute or regulation are stored and maintained in accordance with applicable laws, executive orders and regulations. Records ready for disposal, including classified or other records exempt from disclosure, must be destroyed in accordance with requirements specified in 36 CFR 1228.58.

If you contract with commercial or other records storage facilities outside of Federal Records Centers, the information required above should be reported to NARA through this office. Any questions may be directed to Sharon Evelin at [sharon.evelin@hq.doe.gov](mailto:sharon.evelin@hq.doe.gov) or to Jay Blewett at [jay.blewett@hq.doe.gov](mailto:jay.blewett@hq.doe.gov).